

**REMARKS***In the Claims*

Applicant has amended claims 1-9. Applicant contends that the amendments are supported by the Specification as filed and thus do not constitute new matter.

*In the Drawings*

The drawings were objected to because reference character "4" has been used to designate both the side fastening panel and the transverse fastening panel. Replacement drawings are provided herewith to address the objection. In particular, Applicant has amended Figure 1 to remove reference character 4, which was inadvertently entered thereon, and Applicant has amended Figure 2 to correct the second occurrence of reference character 4 to correctly recite reference character 5. Applicant contends that the corrections are apparent from the context of the Specification as filed and thus do not introduce new matter. Applicant thus respectfully requests entry of the replacement drawings and withdrawal of the objection.

*Claim Objections*

Claims 1-9 were objected to because of informalities. Applicant has amended claims 1-9 in accordance with the Examiner's suggestions. Applicant thus respectfully requests reconsideration and withdrawal of the objections to claims 1-9.

*Claim Rejections Under 35 U.S.C. § 103***Claims 1-2**

Claims 1-2 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schmidt (International Publication No. WO 03/058018) in view of Kern (U.S. Patent No. 3,828,516). Applicant respectfully traverses.

The Office Action identifies corner key 10, profile 14 and profile 12 of Schmidt as corresponding to Applicant's L-shaped fixed member, side frame and transverse frame, respectively. Office Action, page 4, first paragraph. However, Applicant notes that the L-shaped fixed member as recited in claim 1 is provided at the outside of a connection portion of

the side frame and the transverse frame, which is wholly different from each of the cited references. In Schmidt, the corner key 10 is used to connect the profile 14 and the profile 12 together directly, that is, the profile 14 does not contact the profile 12 and there is no connection portion of the profile 14 and the profile 12. Therefore, the corner key 10 of Schmidt is not provided at the outside of any connection portion of the profile 14 and the profile 12 at all. In direct contrast, Schmidt's corner key 10 is interposed between its profile 14 and profile 12.

It is clear from the above that the connection relationship of the components in claim 1 differs from that in each of the references in an essential manner, and it is well-known for those skilled in the art that different connection relationships will result in different structural strengths. Moreover, one of the problems to be solved by Applicant's invention is to improve the connection strength. Secondly, the technical solution of claim 1 in the present application has an upright portion and a transverse portion to realize the connection relationship of the components so as to improve the strength in structure. None of the cited references provide components identical or similar to the upright portion and transverse portion as recited in claim 1, nor do they teach or suggest the same.

Applicant further contends that the Schmidt reference cannot be modified to move its corner key 10 to outside of a connection portion of its profile 14 and profile 12 in a manner necessary to support rejection of claim 1 as such a modification would change the principle of operation of the Schmidt reference. *See* MPEP § 2143.01 (if the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious). As such, the cited references, taken either alone or in combination, fail to teach or render obvious at least this element of claim 1.

In view of the foregoing, Applicant contends that claim 1 is patentably distinct from the cited references, taken either alone or in combination. As claim 2 includes all patentable elements of claim 1, this claim is also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a), and allowance of claim 1-2.

Claim 3

Claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Schmidt (International Publication No. WO 03/058018) in view of Kern (U.S. Patent No. 3,828,516), as applied to claim 2 above, and further in view of Mascioletti et al. (U.S. Patent No. 6,503,020). Applicant respectfully traverses.

Applicant contends that it has shown claim 2 to be patentably distinct from the primary reference of Schmidt and the secondary reference of Kern, taken either alone or in combination. Applicant notes that the tertiary reference of Mascioletti et al. is not purported to cure the deficiencies of the primary and secondary references with respect to claim 2, and Applicant contends that it cannot do so. As such, Applicant contends that claim 2 remains patentably distinct from Schmidt, Kern and Mascioletti et al., whether taken alone or in combination. As claim 3 includes all patentable elements of claim 2, this claim is also believed to be allowable.

Furthermore, the Office Action admits that Schmidt and Kern “fail[] to disclose a side steel lining panel is provided in a groove formed between the holes, the side fastening panel is sandwiched between the side steel lining panel and the L-shaped fixed member and the side fastening bolt connects the side panel, the upright portion of the fixed member and the side steel lining panel together.” Office Action, page 6, first full paragraph. The Office Action then asserts that Mascioletti et al. provides this element. Office Action, page 6, second and third full paragraphs.

Applicant has amended claim 3 to more clearly define its construction. In particular, claim 3 is amended to recite, in part, “the side steel lining panel and the side fastening panel are sandwiched between the side frame and the L-shaped fixed member,” which is supported by Figure 2 and accompanying text of the Specification as filed. According to currently amended claim 3, the side steel lining panel is located between the side frame and the L-shaped fixed member. However, in Mascioletti et al., the connector 38 is located in an aperture 40 of the side frame member 12. Therefore, the position of the side steel lining panel relative to the side frame in the amended claim 3 is different from that in Mascioletti et al. in an essential manner. As such, the combination of Schmidt, Kern and Mascioletti et al. would necessarily fail to teach or render obvious the insertion assembly of claim 3.

In view of the foregoing, Applicant contends that claim 3 is patentably distinct from the cited references, taken either alone or in combination. Applicant thus respectfully request

reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and allowance of claim 3.

Claims 4-9

Claims 4-9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Schmidt (International Publication No. WO 03/058018) in view of Kern (U.S. Patent No. 3,828,516), further in view of Mascioletti et al. (U.S. Patent No. 6,503,020), and further in view of Biro (U.S. Patent No. 4,689,933). Applicant respectfully traverses.

Applicant contends that it has shown claim 1 to be patentably distinct from the primary reference of Schmidt and the secondary reference of Kern, taken either alone or in combination. Applicant notes that neither the tertiary reference of Mascioletti et al., nor the quaternary reference of Biro, is purported to cure the deficiencies of the primary and secondary references with respect to claim 1, and Applicant contends that they cannot do so, either alone or in combination. As such, Applicant contends that claim 1 remains patentably distinct from Schmidt, Kern, Mascioletti et al. and Biro, whether taken alone or in combination. As claims 4-9 include all patentable elements of claim 1, these claims are also believed to be allowable. Applicant thus respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a), and allowance of claims 4-9.

**CONCLUSION**

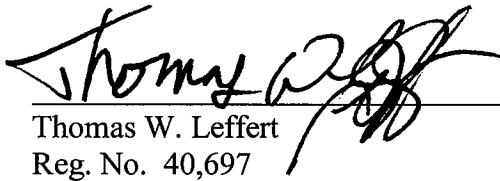
In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 501373.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2204.

Respectfully submitted,

Date:

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